

## ATTORNEYS AT LAW

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June 11, 2025

## VIA ECF ONLY

Hon. Brenda K. Sannes United States District Court, Northern District of New York Federal Building and U.S. Courthouse PO Box 7336 Syracuse, NY 13261-7336

> Alaei v SUNY Albany, et al; 21-CV-377 (BKS/TWD); RE: **Request for Brief Extension**

Dear Judge Sannes:

I am contacting the Court on behalf of the Plaintiff Dr. Kamiar Alaei to request a brief extension of the June 13, 2025 deadline for Plaintiff to provide further briefing on the issues of collateral estoppel, lost benefits, medical expenses, and lost opportunities. Plaintiff previously filed the specific transcript designations with respect to each transcript Plaintiff seeks to use at trial on June 5, 2026 (Document 142)...

Plaintiff respectfully requests an extension until June 20, 2025 to submit his supplemental briefing regarding collateral estoppel, lost benefits, medical expenses, and lost opportunities. Defendant's counsel David White, Assistant Attorney General, consents to the request.

This request is due in part to my having to focus on seeking an injunction in an unrelated State Court matter that has required substantive preparation, among other work issues. I am respectfully requesting that the Court allow the Plaintiff to submit its respective pretrial submissions on or by Friday, June 20, 2025, with the Defendant's response times be extended by one week to July 3, 2025. Defendant's counsel, David White, consents to the requested extension. Thank you for your consideration.

Respectfully submitted,

Joseph F. Castiglione Bar Roll No. \$12406

cc: David C. White, Esq.